

# **United States Nuclear Regulatory Commission**

## **Work Plan for Revision of the Fuel Cycle Facility Oversight Program**

In May 1999, NRC/NMSS formed a team of HQ and Region staff to work with the public, licensees, and other stakeholders to develop a revised oversight program for nuclear fuel cycle facilities. The goal of this project is to have a more stable and predictable oversight program that more effectively and efficiently monitors and responds to changes in licensee performance commensurate with the risk impact on safety and/or common defense and security. In revising the program, stakeholders are working together to develop an oversight program that (1) is more risk informed in ensuring licensees maintain risks to acceptable levels in accordance with regulatory requirements, (2) improves effectiveness and efficiency of the oversight process, (3) reduces unnecessary regulatory burden, and (4) enhances public confidence.

Based on comments from stakeholders, major work/activities for revising the oversight program have been agreed upon and are included in the work plan, which evolved from nine public workshops. In planning the effort, the intent is to optimize the utilization of stakeholders' resources for revising the oversight program in a timely, effective, and efficient manner, and to complete the bulk of the revisions to the program and begin their implementation by Fall 2001 (beginning of Fiscal Year 2002).

### **PURPOSE:**

To inform stakeholders about the current status to the major work/activities for revising the oversight program.

### **OBJECTIVE:**

To describe the major work/activities, milestones, outcomes, cognizant organizations/staff, priorities, and sequence for revising the oversight program.

#	CURRENT PRIORITY & (SEQUENCE)	MAJOR WORK ITEMS/ACTIVITIES FOR REVISION OF NRC's OVERSIGHT PROGRAM FOR SAFETY AND COMMON DEFENSE AND SECURITY AT FUEL CYCLE FACILITIES	CURRENT SCHEDULE (C = COMPLETE)
1	done	<b>Work Plan for Revision of Oversight Program</b> Purpose: To describe the major work/activities, milestones, outcomes, cognizant organizations/staff, priorities, and sequence for revising the oversight program Task: Issue the Work Plan for stakeholder comment Status: Final plan ready for posting on Website Lead: Castleman/Team	12/15/00 (C)
2	done	<b>Work Plan for Revision of Oversight Program</b> Purpose: see task 1 Task: Address stakeholder comments and post final version of plan on NRC Web page Status: Complete. Lead: Castleman/Team	04/06/01 (C)
3	done	<b>Stakeholder Communication Plan(s)</b> Purpose: Inform stakeholders about and facilitate participation in revising and implementing the revised oversight program Task: Prepare final version of Plan for revising Oversight Program for posting on NRC Web page Status: Plan has evolved from public workshops/stakeholder comments and is being finalized for posting on the NRC Web page Lead: N. Howie (State of Illinois), M. Williams, and Castleman/Team	12/15/00 (C)
4	done	<b>Stakeholder Communication Plan(s)</b> Purpose: see task 3 Task: Address stakeholder comments (from task 3) and post final version of plan on NRC web page Status: Complete. Lead: N. Howie, M. Williams, and Castleman/Team	04/01 (C)
5	done	<b>Commission Papers</b> Purpose: Inform Commission about revision of Oversight Program Task: Paper informing Commission about status of Oversight Program Revision Status: SECY-00-0222 sent to Commission Lead: Castleman/Team	11/27/00 (C)
6	done	<b>Commission Briefing</b> Purpose: Inform Commission about status of ongoing revision of Oversight Program Task: Brief Commission Status: Briefing done; SRM dated 01/17/01 Lead: Castleman/Team	12/20/00(C)
7	done	<b>Revised Oversight Program Framework</b> Purpose: Identify the new Oversight Program principal elements and their interrelationships Task: Prepare final version of Framework for posting on NRC web page Status: Final version of Framework posted on Web page Lead: Castleman/Team	11/17/00 (C)
8	done	<b>Safety Oversight Cornerstones</b> Purpose: Develop Safety Cornerstones with objectives that if met provide reasonable assurance mission is satisfied Task: Prepare final version of Cornerstones and post on NRC Web page Status: Final Safety Cornerstones posted on Web page Lead: Castleman/Team	11/17/00 (C)
9	done	<b>Common Defense &amp; Security Oversight Cornerstones</b> Purpose: Develop NRC mission-derived Cornerstones with objectives that, if met, provide reasonable assurance mission is satisfied. Task: Issue for stakeholder comment Status: Complete. Lead: Castleman/Team	1/26/01 (C)
10	done	<b>Common Defense &amp; Security Oversight Cornerstones</b> Purpose: see task 9 Task: Address comments from task 9 and post final version of Cornerstones on NRC Web page Status: Complete. Lead: Castleman/Team	06/19/01 (C)

11	done	<b>Licensee Problem Identification, Resolution, and Corrective Action (PIRCA)</b> Purpose: Develop process/procedures for NRC oversight and crediting of licensee problem identification, resolution, and correction in an effective and timely manner commensurate with risk and regulatory requirements Task: NEI (licensees) development of industry PIRCA program guidance for NRC consideration/issue to satisfy new Part 70 SRP Status: NEI provided principles of corrective action programs at 5/8/01 public meeting. Lead: NEI	05/08/01 (C)
11a	High (1)	<b>Licensee Problem Identification, Resolution, and Corrective Action (PIRCA)</b> Purpose: Establish a general policy on how the effectiveness of licensee corrective actions will be factored into performance assessment and NRC response to performance (this is also tied to changes to the Enforcement Policy). Task: Develop draft policy guidance for inclusion in revisions to IMCs 2600 and 2604, and post on NRC web page. Status: Development began in April 2001. Lead: Castleman	7/13/01
12	High (2)	<b>Inspection Finding Significance Determination</b> Purpose: Develop objective process/procedures for determining risk significance of performance identified during inspection of licensee facilities/activities Task: Develop Significance Determination process and issue for stakeholder comment Status: Development of Significance Determination process began in April 2001. Lead: Castleman /Team	08/15/01
13	Medium (3)	<b>Inspection Finding Significance Determination</b> Purpose: see task 12 Task: Address comments and post final version on NRC Web page Status: Pending completion of task 12 Lead: Castleman/Team	09/30/01
14	High (2)	<b>NRC Inspection Program</b> Purpose: Develop program guidance for inspection of licensees commensurate with risks/performance <ul style="list-style-type: none"> <li>• Baseline inspection (minimum regardless of risks/performance) <ul style="list-style-type: none"> <li>▶ With licensee volunteered performance indicators/thresholds for response</li> <li>▶ Without licensee volunteered performance indicators/thresholds for response</li> </ul> </li> <li>• Inspection in <u>addition</u> to Baseline inspection <ul style="list-style-type: none"> <li>▶ High or uncertain risk and/or poor performance</li> <li>▶ Generic or specific issue or condition</li> <li>▶ Event follow-up</li> <li>▶ Augmented Inspection Team (AIT)</li> <li>▶ Incident Investigation Team (IIT)</li> <li>▶ Inspection in response to allegation</li> </ul> </li> </ul> Task: Develop inspection program guidance, i.e., changes to IMC 2600 program structure to align it with framework (task 7) and significance determination process. Issue for stakeholder comment Status: Development of program/procedures began in May 2001 Lead: Castleman/Team	08/15/01
15	Medium (3)	<b>NRC Inspection Program</b> Purpose: see task 14 Task: Address comments and post final version on NRC Web page Status: Pending completion of task 14. Lead: Castleman/Team	09/30/01
16	High (2)	<b>NRC Response to Licensee Risk Significant Performance</b> Purpose: Develop process/procedures for agency response commensurate with licensee <ul style="list-style-type: none"> <li>▶ risk significant performance in controlling risks to acceptable levels in accordance with NRC requirements and</li> <li>▶ effectiveness and timeliness in identifying, resolving, and correcting problems</li> </ul> Task: Develop agency response process/procedures and issue for stakeholder comment Status: Development of response process/procedures began in May 2001 Lead: Castleman/Team	08/15/01
17	Medium (3)	<b>NRC Response to Licensee Risk Significant Performance</b> Purpose: see task 16 Task: Address comments and post final version on NRC Web Page Status: Pending completion of task 16. Lead: Castleman/Team	09/15/01

18	High (2)	<b>Enforcement Policy</b> Purpose: Develop objective policy/procedures for enforcement actions commensurate with licensee <ul style="list-style-type: none"> <li>▸ risk significant performance in controlling risks to acceptable levels in accordance with NRC requirements and</li> <li>▸ effectiveness and timeliness in identifying, resolving, and correcting problems</li> </ul> Task: Develop Enforcement Policy and issue for stakeholder comment Status: Development of Enforcement Policy began in February 2001 Lead: OE/Castleman/Team	07/31/01
19	Medium (3)	<b>Enforcement Policy</b> Purpose: see task 18. Task: Address comments and post final version on NRC Web Page Status: Pending completion of task 18. Lead: OE/Castleman/Team	08/31/01
20	High (2)	<b>Overall Assessment of Licensee Performance (Licensee Performance Review)</b> Purpose: Develop objective process/procedures for assessing Licensee risk significant performance in controlling risks to acceptable levels in a accordance with NRC requirements (revises Licensee Performance Review process). Task: Draft assessment process/procedures, i.e., changes to IMC 2604, and issue for stakeholder comment. Status: Development of assessment process/procedures began in May 2001. Lead: Castleman/Team	08/15/01
21	Medium (3)	<b>Overall Assessment of Licensee Performance (Licensee Performance Review)</b> Purpose: see task 20 Task: Address comments and post final version on NRC Web Page Status: Pending completion of task 20 Lead: Castleman/Team	09/30/01
22	Low (7)	<b>Licensee Volunteered Risk Significant Performance Indicators with Thresholds for Response</b> Purpose: Develop objective performance indicators of licensee performance and thresholds for response Task: NEI (licensees) development of performance indicators/thresholds for NRC consideration/issue for stakeholder comment Status: NEI (Licensees) will determine what if any performance indicators will be volunteered and offer them for NRC consideration/issuance for stakeholder comment Lead: NEI	[FY 2002]
23	Low (8)	<b>Licensee Volunteered Risk Significant Performance Indicators with Thresholds for Response</b> Purpose: see task 22 Task: NEI address comments and issue final version for NRC consideration/issue Status: pending completion of task 22 Lead: NEI/Castleman/Team	[FY 2002]
24	Medium (4)	<b>Plan for Implementation of New Oversight Program for all Fuel Cycle Facilities</b> Purpose: Implementation of new Oversight Program for all fuel cycle facilities Task: <ul style="list-style-type: none"> <li>a. Complete initial set of Oversight Program and obtain approval</li> <li>b. Budget/allocate resources for initial and continuing implementation of new Oversight Program</li> <li>c. Guidance for Implementing and Maintaining Program</li> <li>d. Logistical support for new Oversight Program</li> <li>e. Revise Master Inspection Plan (MIP) and program documents to reflect new Oversight Program</li> <li>f. Plan for Public Workshop for Training NRC Oversight Staff and Other Stakeholders (Internal &amp; External to NRC) to be held in FY 2002</li> <li>g. Develop guidance for assessing the effectiveness of the oversight program.</li> </ul> Status: Development of plan will begin in July 2001 Lead: Castleman/Team	09/14/01
25	Low (5)	<b>Implement New Oversight Program</b> Purpose: Use new oversight program for oversight of fuel cycle facilities. Task: Begin using new MIP and program guidance documentation Status: Pending completion of task 24. Lead: FCSS/Regions	10/01
26	Low (6)	<b>Revise Inspection Procedures</b> Purpose: Incorporate risk informed guidance commensurate with revised program structure into inspection procedures in parallel with licensee implementation of the revised Part 70. Task: Revise inspection procedures. Status: Pending completion of task 25. Lead: Castleman/Team	FY 2002
27	Low (7)	<b>Public Workshop for Training NRC Oversight Staff and Other Stakeholders</b> Purpose: Ensure stakeholders are familiar with the changes to the oversight process. Task: Train internal and external stakeholders on how to use the revised oversight program guidance. Status: Pending completion of task 25. Lead: Castleman/Team	10/12/01

28	Low (8)	<b>Lessons Learned Review</b> Purpose: Identify areas for improvement and propose program enhancements. Task: Conduct a follow-up review of program implementation to identify "lessons learned" on which to build a platform for fine-tuning adjustments to the revised oversight program. Status: Review to begin after one year of experience with the revised oversight program. Lead: Castleman/Team	11/15/02
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[xxxxxx]: indicates schedule is driven by stakeholder external to NRC.